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7 Attorneys for Defendants PACIFIC BEST GROUP, LTD.,
8 NATIONAL INVESTMENT CONSULTANTS, INC., and
9 WEI M. TSE a.k.a. RAYMOND TSE, and for Relief
Defendant THERESA C. WONG,

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DIVISION OF CALIFORNIA**
SAN FRANCISCO DIVISION

12 U.S. COMMODITY FUTURES TRADING
13 COMMISSION and THE COMMISSIONER OF
14 CORPORATIONS OF THE STATE OF
CALIFORNIA,

15 Plaintiffs,

16 vs.

17 NATIONAL INVESTMENT CONSULTANTS,
18 INC, a California corporation, PACIFIC BEST
19 GROUP LTD, a.k.a. PACIFIC BEST
20 COMPANY LTD, a British Virgin Islands
21 Corporation, YI KERRY XU, an individual,
22 RUN PING ZHOU a.k.a. FLORA ZHOU, an
23 individual, and WEI M. TSE a.k.a. RAYMOND
24 TSE, an individual,

25 Defendants,

26 and

27 THERESA C. WONG, an individual,
28 Relief Defendant.

CASE NO.: 052641 JSW

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING HEARING ON
THELEN REID'S MOTION TO
WITHDRAW AS COUNSEL FOR NICI,
TSE AND WONG

Judge: Hon. Jeffrey S. White

Current Date: June 23, 2006

New Date: July 21, 2006

Time: 9:00 a.m.

Dept.: 2

Complaint filed: June 28, 2005

Trial Date: October 30, 2006

RECITALS

WHEREAS on or about May 15, 2006, Thelen Reid & Priest LLP ("Thelen Reid") filed its Motion For Order Allowing Withdrawal as Counsel of Record for Defendants National Investment Consultants, Inc. ("NICI"), Wei Man Tse a.k.a. Raymond Tse ("Tse") and Relief Defendant Theresa Wong ("Wong") ("Thelen Reid's Motion"); and

WHEREAS a settlement in principal of this action has been reached; and

WHEREAS Thelen Reid's Motion has been fully briefed; and

WHEREAS Thelen Reid's Motion is currently scheduled to be heard June 23, 2006; and

WHEREAS the undersigned counsel of record have agreed that Thelen Reid's Motion may be heard on July 21, 2006 to attempt to conclude the settlement before the hearing and that the continuance of the hearing date shall not prejudice Thelen Reid's motion;

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court that, the time for the hearing on Thelen Reid's Motion is continued to July 21, 2006 at 9:00 a.m.

Dated: June 14, 2006

THELEN REID & PRIEST LLP

By



EDWARD GARTENBERG

Attorneys for Defendants

PACIFIC BEST GROUP LTD, NATIONAL

INVESTMENT CONSULTANTS, INC.; WEI M. TSE

a.k.a. RAYMOND TSE, and for Relief Defendant

THERESA C. WONG

1 Dated: June __, 2006

U.S. COMMODITY FUTURES TRADING COMMISSION

2
3 By /s/

4 KEVIN K. BATTEH
5 JAMES H. HOLL, III
6 ERIN E. VESPE
7 Attorneys for Plaintiff
8 U.S. COMMODITY FUTURES TRADING
9 COMMISSION

10 Dated: June __, 2006

COMMISSIONER OF CORPORATIONS OF THE STATE
OF CALIFORNIA

11 By /s/

12 WAYNE STRUMPFER
13 ALAN S. WENGER
14 EDWARD KELLY SHINNICK
15 Attorneys for Plaintiff
16 COMMISSIONER OF CORPORATIONS OF THE
17 STATE OF CALIFORNIA

18 Dated: June __, 2006

COTTON & GUNDZIK, LLP

19 By /s/

20 JOHN W. COTTON
21 Attorneys for Defendant
22 YI KERRY XU

23 Dated: June __, 2006

LAW OFFICES OF FRED S. KONIGSBERG

24 By /s/

25 FRED S. KONIGSBERG
26 Attorneys for Defendants
27 RUN PING ZHOU aka FLORA ZHOU and
28 SOUTH CHINA INVESTMENTS, INC.

I, Alexandra Epand, hereby attest, pursuant to N.D. Cal. General Order 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

PROPOSED ORDER

Pursuant to Stipulation, the Court makes the following Order:

The parties hereby agree and stipulate, subject to approval of this Court, as follows: The hearing on the Motion of Thelen Reid & Priest LLP to Withdraw as Counsel of Record for Defendants National Investment Consultants, Inc. ("NICI"), Wei Man Tse a.k.a. Raymond Tse ("Tse") and Relief Defendant Theresa Wong ("Wong") is continued to ~~July 21, 2006~~ at 9:00 a.m.

July 28, 2006

IT IS SO ORDERED.

Dated: June 14, 2006


HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT COURT
JUDGE